

Fill in this information to identify the case:

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Debtor 1	Mark Guy Jeune
Debtor 2 (Spouse, if filing)	Jolene Marie Jeune
United States Bankruptcy Court for the: <u>WESTERN</u> District of <u>Pennsylvania</u> (State)	
Case number <u>19-23512-JAD</u>	

Form 4100R**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Planet Home Lending, LLC	Court claim no. (if known): 28
Name of creditor:	
Last 4 digits of any number you use to identify the debtor's account:	2215
Property address:	5511 Century Avenue Number Street
Pittsburgh, Pennsylvania 15207 City State ZIP Code	

Part 2: Prepetition Default Payments

Check one:

- Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 1 / 1 / 2025
MM / DD / YYYY

- Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: / /
MM / DD / YYYY

Debtor 1 **Mark Guy Jeune**
First Name Middle Name Last Name

Case number (if known) **19-23512-JAD**

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- I am the creditor.
- I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

11/15/2024

X /s/ Andrew M. Lubin

Date / /

Signature

Print Andrew M. Lubin Title Attorney for creditor
First Name Middle Name Last Name

Company McCabe, Weisberg & Conway,LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 1420 Walnut Street, Suite 1501
Number Street

Philadelphia, PA 19102
City State ZIP Code

Contact phone (215) 790 - 1010 Email ecfmail@mwc-law.com

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: Mark Guy Jeune and Jolene Marie Jeune Debtors	Chapter 13
Planet Home Lending, LLC, or its Successor or Assignee Movant	Bankruptcy No. 19-23512-JAD
vs.	
Ronda J. Winnecour Mark Guy Jeune and Jolene Marie Jeune Respondents	

CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT

I, Andrew M. Lubin, attorney for Planet Home Lending, LLC, hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: 11/15/24

Mark Guy Jeune
5511 Century Ave
Pittsburgh, Pennsylvania
15207

Jolene Marie Jeune
5511 Century Ave
Pittsburgh, Pennsylvania
15207

Renee M. Kuruce
Robleto Kuruce, PLLC
6101 Penn Ave.
Suite 201
Pittsburgh, PA 15206
Attorney for Debtors

Office of the United States
Trustee
Liberty Center.
1001 Liberty Avenue, Suite
970
Pittsburgh, Pennsylvania
15222

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, Pennsylvania
15219
Trustee

Aurelius P. Robleto
Robleto Kuruce, PLLC
3706 Butler Street
Pittsburgh, PA 15201
Attorney for Debtors

/s/ Andrew M. Lubin

MARISA MYERS COHEN, ESQUIRE ID #87830
ANDREW M. LUBIN, ESQUIRE ID # 54297
Attorney for Planet Home Lending, LLC
1420 Walnut Street, Suite 1501
Philadelphia, PA 19102
Telephone: (215) 790-1010

Facsimile: (215) 790-1274
Email: ecfmail@mwc-law.com